

## **Exhibit 40**

Excerpts of deposition of David Alan Johnson  
(November 17, 2023)

**In the Matter Of:**  
**THE SATANIC TEMPLE**  
**VS**  
**NEWSWEEK DIGITAL**

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**DAVID JOHNSON**

November 17, 2023

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November 17, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

David Johnson

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 -----

4 THE SATANIC TEMPLE, INC., )  
5 Plaintiff, ) **COPY**  
6 vs. ) NO. 1:22-CV-01343-MKV  
7 NEWSWEEK DIGITAL, LLC, )  
8 Defendant. )  
9 -----

10 Videotaped Deposition Upon Oral Examination

11 of

12 DAVID ALAN JOHNSON

13 -----

14 Friday, November 17, 2023

15 9:36 a.m.

16 7900 Southeast 28th Street

17 Mercer Island, Washington

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24 Cheryl Macdonald, CRR, RMR  
Court Reporter  
25 License No. 2498

November 17, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

David Johnson

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|---|--------|--------|
| <p>1 APP E A R A N C E S</p> <p>2 FOR THE PLAINTIFF:</p> <p>3 MATT KEZHAYA<br/>SONIA KEZHAYA<br/>4 Attorneys at Law<br/>KEZHAYA LAW PLC<br/>5 150 South Fifth Street<br/>Suite 1850<br/>6 Minneapolis, Minnesota 55402<br/>matt@kezhaya.law<br/>sonia@kezhaya.law</p> <p>7 FOR THE DEFENDANT:</p> <p>8 SARA TESORIERO<br/>9 Attorney at Law<br/>STRACHER LAW<br/>10 51 Astor Place<br/>9th Floor<br/>11 New York, New York 10003<br/>sara@stracherlaw.com</p> <p>12 FOR THE WITNESS:</p> <p>13 JEREMY E. ROLLER<br/>14 Attorney at Law<br/>ARETE LAW GROUP<br/>15 1218 Third Avenue<br/>Suite 2100<br/>16 Seattle, Washington 98101<br/>roller@aretelaw.com</p> <p>17 THE COURT REPORTER and VIDEOGRAPHER:</p> <p>18 CHERYL MACDONALD<br/>19 KALIA HENDRICKS<br/>MOBURG REPORTING<br/>20 33400 9th Avenue South<br/>Suite 207<br/>21 Federal Way, Washington 98003<br/>info@moburgreporting.com</p> | Page 2 | Page 4 |
| <p>1 I N D E X</p> <p>2</p> <p>3 EXAMINATION</p> <p>4 BY MR. KEZHAYA: .....</p> <p>5 BY MS. TESORIERO: .....</p> <p>6</p> <p>7 EXHIBITS MARKED</p> <p>8 (No exhibits marked.)</p>   | Page 3 | Page 5 |

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| <p>1        MR. ROLLER: Object to the form of the<br/>2 question, but you can answer.<br/>3        A. If you read it just now, I guess that's<br/>4 what it says.<br/>5        <b>Q. Okay. But in terms of what you understand</b><br/>6 <b>that when I say "article statement," that's what the</b><br/>7 <b>article statement is; right?</b><br/>8        A. Sure.<br/>9        <b>Q. You did not write the article statement;</b><br/>10 <b>correct?</b><br/>11      A. Correct.<br/>12      <b>Q. Jinx Strange wrote that article statement.</b><br/>13 <b>Also correct?</b><br/>14      MS. TESORIERO: Object to the form.<br/>15      A. I'm not sure. I thought this was about the<br/>16 Newsweek article.<br/>17      <b>Q. Yes. So the quote that I quoted from is</b><br/>18 <b>from the Newsweek article, but nestled within the</b><br/>19 <b>Newsweek article is a quote of Jinx Strange. Do you</b><br/>20 <b>recall that?</b><br/>21      A. I recall that Jinx Strange was quoted, but<br/>22 I don't recall what part of it he said versus someone<br/>23 else.<br/>24      <b>Q. Okay. Do you know whether Jinx Strange is</b><br/>25 <b>a pseudonym?</b></p> | Page 6 | <p>1 <b>TST engages in sexual abuse and cover-up. How would</b><br/>2 <b>you define sexual abuse?</b><br/>3        MS. TESORIERO: Objection to form.<br/>4        MR. ROLLER: Same objection. You can<br/>5 answer.<br/>6        A. I guess I would define it as things like<br/>7 sexual assault, things like inappropriate sexual<br/>8 relationships. I'm not sure. I don't really define<br/>9 terms like that.<br/>10      <b>Q. When you say "inappropriate sexual</b><br/>11 <b>relationships," does that, in your mind, carry a</b><br/>12 <b>connotation of criminal activity?</b><br/>13      MS. TESORIERO: Objection to form.<br/>14      MR. ROLLER: Can we just have an<br/>15 understanding that an objection by Sara or me is an<br/>16 objection of both?<br/>17      MR. KEZHAYA: Yes. Y'all don't have to<br/>18 both -- do we want to take a break?<br/>19      MR. ROLLER: No.<br/>20      <b>Q. The question posed is whether, in your</b><br/>21 <b>mind, an inappropriate sexual relationship connotes</b><br/>22 <b>criminal activity.</b><br/>23      A. I would say, not necessarily.<br/>24      <b>Q. How about cover-up? How would you define</b><br/>25 <b>cover-up?</b></p>   | Page 8 |
| <p>1        A. I believe that's a pseudonym, yes.<br/>2        <b>Q. Do you know where Jinx Strange is?</b><br/>3        A. I am not sure, no.<br/>4        <b>Q. Beyond the e-mail address that Julia Duin</b><br/>5 <b>e-mailed, do you have any contact information --</b><br/>6        MR. ROLLER: Object to the form of the<br/>7 question, but you can answer.<br/>8        <b>Q. -- for Jinx Strange?</b><br/>9        A. I'm not sure. I may have a way to contact<br/>10 Jinx Strange.<br/>11      <b>Q. How would you go about contacting Jinx</b><br/>12 <b>Strange if not through e-mail?</b><br/>13      A. I could Facebook message him. I think<br/>14 that's probably what I would do.<br/>15      <b>Q. Do you have a phone number for Jinx</b><br/>16 <b>Strange?</b><br/>17      A. I do not.<br/>18      <b>Q. Do you have a residential address for Jinx</b><br/>19 <b>Strange?</b><br/>20      A. I do not.<br/>21      <b>Q. Do you have a work address for Jinx</b><br/>22 <b>Strange?</b><br/>23      A. I do not.<br/>24      <b>Q. Returning your attention back to the</b><br/>25 <b>article statement, at issue is an allegation that</b></p>       | Page 7 | <p>1        MS. TESORIERO: Objection to form.<br/>2        A. Within the context of The Satanic Temple?<br/>3        <b>Q. Correct. More particularly within the</b><br/>4 <b>context of the statement, so also nested therein</b><br/>5 <b>within the context of TST.</b><br/>6        MR. ROLLER: Object to the form. You can<br/>7 answer.<br/>8        A. I would say things like hearing about<br/>9 something that happens, and choosing not to address<br/>10 the root problem but to address the complaint, and to<br/>11 make the -- to treat the complaints as more of an<br/>12 issue than any underlying sexual abuse or harassment.<br/>13      <b>Q. Would removing the offending member exclude</b><br/>14 <b>a cover-up?</b><br/>15      MR. ROLLER: Object to the form.<br/>16      A. Sir, could you restate the question?<br/>17      <b>Q. So within the context of this statement,</b><br/>18 <b>there is sexual abuse and cover-up. That's the</b><br/>19 <b>allegation. If the offending member or the person</b><br/>20 <b>about whom the complaint is made is no longer a member</b><br/>21 <b>of TST, is that a cover-up in your opinion?</b><br/>22      MS. TESORIERO: Objection.<br/>23      MR. ROLLER: Objection to form.<br/>24      A. I think it would depend on the<br/>25 circumstances, especially if a person was removed far</p> | Page 9 |

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| <p>Page 10</p> <p>1 after a complaint was made. It could be incidental.<br/>   2 They could be removed for some other reason besides<br/>   3 that.</p> <p><b>4 Q. So if they were removed because of the<br/>   5 complaint, though, then that's not a cover-up, in your<br/>   6 opinion; is that correct?</b></p> <p>7 MS. TESORIERO: Objection to form.</p> <p>8 A. I think it depends on the particulars of<br/>   9 the situation.</p> <p><b>10 Q. Okay. Have you personally witnessed any<br/>   11 sexual abuse within The Satanic Temple?</b></p> <p>12 A. I have not.</p> <p><b>13 Q. You gave an interview to Julia Duin at some<br/>   14 point previously; is that correct?</b></p> <p>15 A. That is correct.</p> <p><b>16 Q. During that interview you indicated --<br/>   17 well, let's back up. I believe during that interview<br/>   18 you indicated that you were a witness to a sexual<br/>   19 harassment complaint. Do you recall that?</b></p> <p>20 A. That sounds correct, yes.</p> <p><b>21 Q. And when I say "I believe," I'm not sure if<br/>   22 it was you or if it was someone else. So unpacking it<br/>   23 slightly, did you indicate to Julia Duin that you were<br/>   24 a witness to a sexual harassment complaint?</b></p> <p>25 A. I believe that is correct, yes.</p>                                      | <p>Page 12</p> <p><b>1 Q. You say when "that was brought up." What<br/>   2 was brought up?</b></p> <p>3 A. In 2020, when the former member, who was<br/>   4 unhappy about the way their sexual harassment had been<br/>   5 treated, talked publicly about it, as their<br/>   6 unhappiness with their treatment in the organization.</p> <p><b>7 Q. Was this a written complaint or an<br/>   8 unwritten complaint?</b></p> <p>9 A. I believe it was a Facebook post.</p> <p><b>10 Q. So this was -- backing up slightly, are you<br/>   11 familiar with the concept of National Council or<br/>   12 International Council?</b></p> <p>13 A. Within the context of The Satanic Temple?</p> <p><b>14 Q. Correct.</b></p> <p>15 A. My understanding is that the National<br/>   16 Council and International Council were a leadership<br/>   17 committee directly below Doug Misicko and Cevin<br/>   18 Soling, the executive committee.</p> <p><b>19 Q. But the question posed is whether you're<br/>   20 familiar with them in the first place. So that's a<br/>   21 yes, correct?</b></p> <p>22 A. If what I just said was accurate, then yes.</p> <p><b>23 Q. Within your understanding, did<br/>   24 International Council or National Council investigate<br/>   25 matters of claims of sexual harassment?</b></p> |
| <p>Page 11</p> <p><b>1 Q. Okay. In your definition of sexual abuse,<br/>   2 whatever the sexual harassment complaint was, was that<br/>   3 sexual abuse?</b></p> <p>4 A. I don't know that I feel qualified to say.</p> <p><b>5 Q. Okay. Well, what was the sexual harassment<br/>   6 complaint?</b></p> <p>7 A. There was a former member of the local<br/>   8 TST group who had been, from my understanding,<br/>   9 repeatedly made to feel uncomfortable by a much older<br/>   10 member. I think -- I think this was in a period of<br/>   11 2017 to 2018. So it was before I was a member. They<br/>   12 left because it was nonaddressed for months, and then<br/>   13 I found out about it in 2020.</p> <p><b>14 Q. Let's unpack that slightly. You indicated<br/>   15 that you were a listed witness on a complaint;<br/>   16 correct?</b></p> <p>17 MR. ROLLER: Object to the form. I think<br/>   18 it misstates prior testimony.</p> <p><b>19 Q. Let me rephrase. You indicated to Duin<br/>   20 that you were a listed witness on a sexual harassment<br/>   21 complaint; correct?</b></p> <p>22 A. I'm not -- I'm not sure. There was a<br/>   23 complaint by a person who was no longer a member. We<br/>   24 found out about it in 2020, and then that was brought<br/>   25 up. That's when I was made aware of it.</p> | <p>Page 13</p> <p>1 MS. TESORIERO: Objection to form.</p> <p>2 MR. ROLLER: Object to form.</p> <p>3 A. Sorry. Could you restate the question?</p> <p><b>4 Q. In your understanding, did national -- I'm<br/>   5 just going to call it the National Council. In your<br/>   6 understanding, did National Council investigate claims<br/>   7 of sexual harassment?</b></p> <p>8 A. I am not sure. I have heard that that's<br/>   9 so.</p> <p><b>10 Q. Okay. But you lack personal knowledge;<br/>   11 correct?</b></p> <p>12 A. That's correct.</p> <p><b>13 Q. Okay. Do you have any personal knowledge<br/>   14 whether the person who claimed sexual harassment ever<br/>   15 raised a complaint to national council?</b></p> <p>16 A. I do not know that, no.</p> <p><b>17 Q. You indicated that you were a witness. I'm<br/>   18 having trouble understanding how you are a witness in<br/>   19 this complaint.</b></p> <p>20 MR. ROLLER: Object to the form.</p> <p><b>21 Q. Please help me understand that. You<br/>   22 indicated to Duin, "We were a witness", correct?</b></p> <p>23 A. I'm not sure what the -- that's what we<br/>   24 said. If that's what the transcript is, then that's<br/>   25 what we said.</p>   |

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| <p>1     A. I did not witness the sexual harassment<br/>2 before I was a member, that's correct.</p> <p>3     <b>Q. And have you seen any other sexual abuse of<br/>4 any sort within The Satanic Temple?</b></p> <p>5         MS. TESORIERO: Objection to form.</p> <p>6     A. When you say that, do you mean have I<br/>7 witnessed with my own eyes?</p> <p>8     <b>Q. Correct, yeah. You personally.</b></p> <p>9     A. No, I don't believe so.</p> <p>10    <b>Q. Okay. So any knowledge you have would be<br/>11 based on hearsay; is that correct?</b></p> <p>12    MR. ROLLER: Objection to the form.</p> <p>13    A. Knowledge I have comes from other people<br/>14 who experienced things, yes.</p> <p>15    <b>Q. And the information that you received from<br/>16 other people who experienced things, did they give you<br/>17 this information under penalty of perjury?</b></p> <p>18    MS. TESORIERO: Objection to form.</p> <p>19    A. No.</p> <p>20    <b>Q. This complaint in 2020, did you raise any<br/>21 criminal complaints on the matter?</b></p> <p>22    A. I did not.</p> <p>23    <b>Q. To your knowledge, were any criminal<br/>24 complaints ever raised?</b></p> <p>25    A. To my knowledge, no.</p> | <p>Page 18</p> <p>1     <b>Q. So to be more particular, you personally<br/>2 know that he was not a member of TST Washington in<br/>3 2020; correct?</b></p> <p>4         MR. ROLLER: Object to the form, but you<br/>5 can answer.</p> <p>6     A. That's a somewhat complicated question<br/>7 because membership was not kept up in a particularly<br/>8 organized way. So, to my knowledge, he was not a<br/>9 member anymore.</p> <p>10    <b>Q. But I'm trying to ascertain -- you say to<br/>11 your knowledge, meaning you affirmatively know that he<br/>12 was not; is that correct?</b></p> <p>13    A. I do not know that he was not.</p> <p>14    <b>Q. Okay.</b></p> <p>15    A. Yeah.</p> <p>16    <b>Q. And how do you know that or -- strike that.<br/>17 What would constitute him being a member or<br/>18 not a member of TST Washington, in your opinion?</b></p> <p>19    A. In my mind?</p> <p>20    <b>Q. Mm-hmm.</b></p> <p>21    A. There were lists of people who were<br/>22 members. However, those lists were not up to date.<br/>23 So sometimes people who were supposedly expelled were<br/>24 not actually, like, officially expelled, if that makes<br/>25 sense.</p>  | <p>Page 20</p> |
| <p>1     <b>Q. To your knowledge, were there ever any<br/>2 criminal charges on the matter?</b></p> <p>3     A. To my knowledge, no.</p> <p>4         MR. KEZHAYA: I think we're at a good place<br/>5 to take a break.</p> <p>6         THE VIDEOGRAPHER: We're now going off the<br/>7 record. The time is now 9:56 a.m.</p> <p>8         (Recess.)</p> <p>9         THE VIDEOGRAPHER: We are now back on the<br/>10 record. The time is now 10:02 a.m.</p> <p>11    <b>Q. Do you recall the name of the person about<br/>12 whom this 2017 sexual harassment claim was raised?</b></p> <p>13    A. I believe I know their pseudonym.</p> <p>14    <b>Q. What is their pseudonym?</b></p> <p>15    A. Dice Marlow.</p> <p>16    <b>Q. How do I spell Dice?</b></p> <p>17    A. D-I-C-E, and then Marlow, I believe, is<br/>18 M-A-R-L-O-W.</p> <p>19    <b>Q. Do you recall the name or pseudonym of the<br/>20 person who allegedly sexually harassed Dice Marlow?</b></p> <p>21    A. To my recollection, the pseudonym was John<br/>22 Milton.</p> <p>23    <b>Q. Do you know whether John Milton, as of<br/>24 2020, was still a member of TST Washington?</b></p> <p>25    A. To my knowledge he was not.</p>                         | <p>Page 19</p> <p>1     <b>Q. Yeah, meaning their name was not struck<br/>2 from some list; correct?</b></p> <p>3     A. No. There were lists of active members and<br/>4 supposedly expelled members, but this was not kept up<br/>5 to date in any sort of accurate way, in my experience<br/>6 with the organization.</p> <p>7     <b>Q. Did TST Washington have in-person events?</b></p> <p>8     A. They did, yes.</p> <p>9     <b>Q. If John Milton showed up at one of those<br/>10 in-person events, would he have been removed?</b></p> <p>11    A. I am not sure.</p> <p>12    <b>Q. Would he have been welcomed?</b></p> <p>13    A. I am not sure.</p> <p>14    <b>Q. Did you ever tell Duin that you personally<br/>15 witnessed any form of sexual abuse?</b></p> <p>16    A. Not to my knowledge, no.</p> <p>17    <b>Q. Did you ever tell Duin that you personally<br/>18 witnessed any form of cover-up?</b></p> <p>19    A. Not to my recollection, no.</p> <p>20    <b>Q. Did Duin ever ask you for any clarifying<br/>21 details as to the ethics complaint?</b></p> <p>22    MS. TESORIERO: Objection to form.</p> <p>23    A. Not to my recollection, but if you have the<br/>24 interview, then that would -- that should say that.</p> <p>25    <b>Q. So, in other words, if it's not in the</b></p> | <p>Page 21</p> |

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| <p>1 questions.</p> <p>2 THE VIDEOGRAPHER: We are now going off the</p> <p>3 record. This marks the end of the deposition of David</p> <p>4 Alan Johnson. The time is now 10:27 a.m.</p> <p>5 THE REPORTER: Signature?</p> <p>6 MR. ROLLING: Yes. We want to read it.</p> <p>7 MR. KEZHAYA: We'll need the transcript.</p> <p>8 MS. TESORIERO: Copy, please.</p> <p>9 (Deposition concluded at 10:27 a.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>   | Page 34 | <p>1 outcome thereof;</p> <p>2 I further certify that the witness before</p> <p>3 examination was by me duly sworn to testify to the</p> <p>4 truth, the whole truth, and nothing but the truth;</p> <p>5 I further certify that the deposition, as</p> <p>6 transcribed, is a full, true and correct transcript of</p> <p>7 the testimony, including questions and answers, and</p> <p>8 all objections, motions, and exceptions of counsel</p> <p>9 made and taken at the time of foregoing examination</p> <p>10 and was prepared pursuant to Washington Administrative</p> <p>11 Code 308-14-135, the transcript preparation format</p> <p>12 guideline;</p> <p>13 I further certify that I am sealing the</p> <p>14 deposition in an envelope with the title of the above</p> <p>15 cause and the name of the witness visible, and I am</p> <p>16 delivering the same to the appropriate authority;</p> <p>17</p> <p>18 IN WITNESS WHEREOF, I have hereunto set my hand,</p> <p>19 and affixed my official seal this 30th day of</p> <p>20 NOVember 2023.</p> <p>21</p> <hr/> <p>22 Cheryl Macdonald, CCR</p> <p>23 Washington State Certified</p> <p>24 Court Reporter</p> <p>25 License No. 2498</p> |
| <p>1 C E R T I F I C A T E</p> <p>2</p> <p>3 STATE OF WASHINGTON )</p> <p>4 ) ss.</p> <p>5 COUNTY OF KING )</p> <p>6</p> <p>7 I, the undersigned Washington Certified Court</p> <p>8 Reporter, pursuant to RCW 5.28.010, authorized to</p> <p>9 administer oaths and affirmations in and for the State</p> <p>10 of Washington, do hereby certify:</p> <p>11 That the annexed and foregoing deposition</p> <p>12 consisting of Page 1 through 34 was taken</p> <p>13 stenographically before me and reduced to a typed</p> <p>14 format under my direction;</p> <p>15 I further certify that according to CR 30(e) the</p> <p>16 witness was given the opportunity to examine, read and</p> <p>17 sign after the same was transcribed, unless indicated</p> <p>18 in the record that the review was waived;</p> <p>19 I further certify that all objections made at the</p> <p>20 time of said examination to my qualifications or the</p> <p>21 manner of taking the deposition, or to the conduct of</p> <p>22 any party, have been noted by me upon said deposition;</p> <p>23 I further certify that I am not a relative or</p> <p>24 employee of any such attorney or counsel, and that I</p> <p>25 am not financially interested in said action or the</p> | Page 35 | <p>1 D E C L A R A T I O N</p> <p>2</p> <p>3</p> <p>4</p> <p>5 I declare under penalty of perjury that I</p> <p>6 have read my within deposition, and the same is true</p> <p>7 and accurate, save and except for changes and/or</p> <p>8 corrections, if any, as indicated by me on the</p> <p>9 correction sheet hereof.</p> <p>10</p> <p>11</p> <p>12</p> <p>13 DAVID ALAN JOHNSON</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19 Dated this _____ day of _____,</p> <p>20 2023.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25 CHERYL MACDONALD, Court Reporter</p>   |

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| <p>1<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p> <p>MOBURG REPORTING<br/>COURT REPORTERS &amp; LEGAL VIDEO<br/>33400 9th Avenue South<br/>Suite 207<br/>Federal Way, WA 98003<br/>206-622-3110</p> <p>PLEASE MAKE ALL CHANGES OR CORRECTIONS ON THIS SHEET,<br/>SHOWING PAGE, LINE, AND REASON, IF ANY. SIGN THIS<br/>SHEET, SIGN THE ACCOMPANYING SIGNATURE SHEET AND<br/>RETURN AS PER INSTRUCTIONS IN COVER LETTER.</p> <p>PAGE LINE CORRECTION AND REASON</p> <p>(SIGNATURE)</p> <p>REPORTER: CHERYL MACDONALD</p> | <p>Page 38</p> <p>1<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p> <p>Certification of Court Rule and WAC Compliance<br/>The Satanic Temple v. Newsweek<br/>I, VALERIE SEATON, am an authorized representative of<br/>MOBURG REPORTING and do hereby, under penalty of perjury,<br/>certify that Moburg Reporting and all court reporters<br/>providing services in the above-captioned case on MOBURG<br/>REPORTING'S behalf will fully comply with all applicable<br/>rules and regulations governing the provision of court<br/>reporting services, including, where applicable,<br/>Washington Superior Court Rule 28(c)-(e) and WAC<br/>308-14-130(1).*</p> <p>11/30/23</p> <p>Valerie L. Seaton<br/>President<br/>Moburg Reporting</p> <p>*28(c) Disqualification for Interest. No deposition<br/>shall be taken before a person who is a relative or<br/>employee or attorney or counsel of any of the parties, or<br/>is a relative or employee of such attorney or counsel, or<br/>is financially interested in the action.<br/>28(d) Equal Terms Required. Any arrangement concerning<br/>court reporting services or fees in a case shall be<br/>offered to all parties on equal terms. This rule applies<br/>to any arrangement or agreement between the person before<br/>whom a deposition is taken or a court reporting firm,<br/>consortium, or other organization providing a court<br/>reporter, and any party or any person arranging or paying<br/>for court reporting services in the case, including any<br/>attorney, law firm, person or entity with a financial<br/>interest in the outcome of the litigation, or person or<br/>entity paying for court reporting services in the case.<br/>28(e) Final Certification of the Transcript. The court<br/>reporter reporting a deposition shall not certify the<br/>deposition transcript until after he or she has reviewed<br/>the final version of the formatted transcript. A court<br/>reporting firm, consortium, or other organization<br/>transmitting a court reporter's certified transcript<br/>shall not alter the format, layout, or content of the<br/>transcript after it has been certified.<br/>*308-14-130(1) Offer arrangements on a case<br/>concerning court reporting services or fees to all parties<br/>on equal terms.</p> <p>Page 39</p> <p>MOBURG REPORTING<br/>Court Reporters &amp; Legal Video<br/>33400 9th Avenue South, Suite 207<br/>Federal Way, WA 98003<br/>(206) 622-3110 FAX (206) 343-2272<br/>E-mail: info@moburgreporting.com</p> <p>TO: Jeremy E. Roller November 30, 2023<br/>Arete Law Group<br/>1218 3rd Avenue<br/>Suite 2100<br/>Seattle, WA 98101</p> <p>IN RE: The Satanic Temple v. Newsweek<br/>DEPOSITION(S) OF: David Alan Johnson<br/>DATE OF DEPOSITION: November 17, 2023<br/>A copy of the deposition transcript of the above-named<br/>is provided via E-transcript. Please have the<br/>deponent read the deposition, sign the correction<br/>sheet and declaration. The signed correction sheet<br/>and declaration should then, within 30 (thirty) days,<br/>be forwarded to:<br/>CHERYL MACDONALD<br/>33400 9th Ave. So. #207<br/>Federal Way, Washington 98003<br/>who will then enclose them in the original transcript,<br/>seal it, and forward it to Mr. Kezhaya for retention<br/>until the time of trial.<br/>If you have any questions, feel free to contact<br/>me at the number listed above.<br/>Sincerely,<br/>CHERYL MACDONALD, CCR<br/>CC: S. Tesoriero M. Kezhaya</p> |
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